

Exhibit E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' FIRST SUPPLEMENTAL RESPONSE TO PLAINTIFF'S
FOURTH SET OF INTERROGATORIES**

Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill") submit this First Supplemental Response to Plaintiff's Fourth Set of Interrogatories.

SUPPLEMENTAL OBJECTIONS AND ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 21: With regard to each of the third party games referred to in Defendants' Second Supplemental Objections and Responses to Plaintiff's First Interrogatories to Defendants dated March 16, 2018, identify all facts of which CHG has knowledge, including stating whether CHG has any knowledge as to (1) whether each of these games is/was located in any of the same casinos as VGT and/or CHG games, (2) the dates during which each of these games has been/was in operation, (3) whether each of these games is/was a Class II game, and (4) whether each of these games is/was a 3-reel mechanical game.

RESPONSE: Castle Hill objects to this Interrogatory as overly broad and unduly burdensome. In its Second Supplemental Objections and Responses to Plaintiff's First Interrogatories, Castle Hill identified over 90 different electronic gaming machine titles which have similar themes, characters, or names to the VGT and Castle Hill games at issue in this case.

Castle Hill further included images of the machines and identified the relevant manufacturer of certain titles. VGT's request for Castle Hill to identify "all facts" regarding the more than 90 titles identified in Castle Hill's prior response is overly broad and unduly burdensome. Castle Hill further objects to this Interrogatory as compound in that it seeks "all facts" relating to the more than 90 titles identified in Castle Hill's prior response. Even if the interrogatory were limited to only the four items mentioned in the Interrogatory, which it is not, it would still contain more than three-hundred sixty subparts. Castle Hill further objects to this Interrogatory to the extent it seeks information protected by attorney-client privilege and/or the work product doctrine.

FIRST SUPPLEMENTAL RESPONSE: Castle Hill incorporates its General Objections set forth in its original Response to Plaintiff's Fourth Set of Interrogatories. Castle Hill further incorporates the objections and response set forth in its original response to Interrogatory No. 21 as set forth above.

Subject to and without waiver of these objections, Castle Hill states that it is without knowledge or information sufficient to answer as to the dates of operation of each of the third-party games referred to in this request. However, Castle Hill is aware of the following with respect to the third-party games which have similar themes, characters, or names to the VGT and Castle Hill games at issue in this case:

Winning Bid 2 is manufactured by WMS and games have been located in the Grand Casino Hotel & Resort in Shawnee, Oklahoma (the "Grand Casino Shawnee") and the Bordertown Casino and Arena in Wyandotte, Oklahoma (the "Bordertown Casino") at the same time as Castle Hill and VGT games. Big Vegas, Speakeasy King, and Vegas Hits are Class II

games manufactured by Bally. Crazy Vegas is a Class II game manufactured by Cadillac Jack. Rum City is manufactured by Bally. Double Agent is manufactured by Everi.

Filthy Rich 2 – Shakin’ Bacon is manufactured by WMS and games have been located in the Grand Casino Shawnee at the same time as Castle Hill and VGT games. Highway Hogs is manufactured by Eclipse and games have been located in the Grand Casino Shawnee at the same time as Castle Hill and VGT games. Road Hogs is a Class II game manufactured by Diamond. Pigs on the Run is a Class II game manufactured by AGS. Piggy Bankin’ is a 3-reel mechanical game manufactured by WMS. Pork Choppers is manufactured by Eclipse. High on the Hog is manufactured by IGT. Wild Riders is manufactured by Cadillac Jack.

Strike It Rich Again! is a Class II, 3-reel mechanical game manufactured by IGT and games have been located in the Choctaw Casino & Resort in Durant, Oklahoma at the same time as Castle Hill and VGT games. Strike It Rich is a 3-reel mechanical game manufactured by IGT. Gold Miner is manufactured by Aristocrat. Miner’s Quest is manufactured by Cadillac Jack.

Wild Wild Gems is a Class II, 3-reel mechanical game manufactured by Everi and games have been located in the WinStar World Casino and Resort in Thackerville, Oklahoma (“WinStar Casino”) at the same time as Castle Hill and VGT games. Super Rubies is a Class II game manufactured by Everi and games have been located in the WinStar Casino at the same time as Castle Hill and VGT games. Gem Rush is manufactured by Everi and games have been located in the WinStar Casino at the same time as Castle Hill and VGT games. Sapphire Chance is manufactured by Bally and games have been located in the 7 Clans Perry Casino in Perry, Oklahoma (“Perry Casino”) at the same time as VGT games. Genie Wishes is a Class II game manufactured by IGT. Gems Gems Gems is a Class II game manufactured by WMS. Genie’s Jackpot is a Class II game manufactured by Cadillac Jack. Lock It Link Diamond is a Class II

game manufactured by Bally. Pink Diamond is a 3-reel mechanical game manufactured by IGT. Genie's Gold is manufactured by Bally. Diamonds Plus is manufactured by Incredible Technologies.

Stinkin' Rich is a Class II game manufactured by IGT and games have been located in Cimarron Casino in Perkins, Oklahoma ("Cimarron Casino"), 7 Clans Gasino Chilocco Casino in Newkirk, Oklahoma ("Chilocco Casino"), and Bordertown Casino at the same time as Castle Hill and VGT games. The Money Man is manufactured by Multimedia and games have been located in the Bordertown Casino at the same time as Castle Hill and VGT games. Bags of Cash is manufactured by Aruze and games have been located in the 7 Clans Paradise Casino in Red Rock, Oklahoma ("Paradise Casino") at the same time as Castle Hill and VGT Games. Money Talks is a Class II, 3-reel mechanical game manufactured by Bally. Double Fat Cash is a 3-reel mechanical game manufactured by IGT. Catch the Money is manufactured by Aruze.

Polar Plunge is manufactured by IGT and games have been located in the Paradise Casino and Chilocco Casino at the same time as Castle Hill and VGT games, as well as in the Perry Casino at the same time as VGT games. Just Chillin is a Class II game manufactured by Nova.

Desperado's Wild is manufactured by Cadillac Jack. Winner of the West is manufactured by IT.

Murphy's Luck is a Class II game manufactured by Cadillac Jack. Irish Gold is a Class II game manufactured by Diamond. Leprechaun's Gold – Hot Hot Super Jackpot is a 3-reel mechanical game manufactured by WMS.

Diamond Skies is manufactured by IGT and games have been located in the Cimarron Casino and Bordertown Casino at the same time as Castle Hill and VGT games. Double Cherry

is manufactured by Multimedia and games have been located in the WinStar Casino at the same time as Castle Hill and VGT games. Double Sizzling Rose is a Class II, 3-reel mechanical game manufactured by IGT. Saints and Sinners is a Class II game manufactured by Rocket. Wild Thing is a 3-reel mechanical game manufactured by IGT.

Lady Swan is a Class II game manufactured by IGT and games have been located in the Cimarron Casino and Bordertown Casino at the same time as CHG and VGT games, as well as in the Perry Casino at the same time as VGT games. Pirate Queen is a Class II game manufactured by Bally and games have been located in the Cimarron Casino and Bordertown Casino at the same time as Castle Hill and VGT games.

By way of further response, Castle Hill states that additional information regarding the third-party games referred to in this request was produced at: CHG0134189 – CHG0134526.

Dated: July 29, 2018

Respectfully submitted,

/s/ Robert C. Gill

Robert C. Gill (admitted *pro hac vice*)
Thomas S. Schaufelberger (admitted *pro hac vice*)
Henry A. Platt (admitted *pro hac vice*)
Matthew J. Antonelli (admitted *pro hac vice*)
SAUL EWING ARNSTEIN & LEHR, LLP
1919 Pennsylvania Avenue, NW, Suite 550
Washington, D.C. 20006
(202) 295-6605
(202) 295-6705 (facsimile)
robert.gill@saul.com
tschauf@saul.com
henry.platt@saul.com
matt.antonelli@saul.com

Sherry H. Flax (admitted *pro hac vice*)
SAUL EWING ARNSTEIN & LEHR, LLP
500 E. Pratt Street, Suite 900
Baltimore, Maryland 21202
(410) 332-8764
(410) 332-8785 (facsimile)
sherry.flax@saul.com

James C. Hodges, OBA #4254
JAMES C. HODGES, P.C.

2622 East 21st Street, Suite 4
Tulsa, Oklahoma 74114
(918) 779-7078
(918) 770-9779 (facsimile)
JHodges@HodgesLC.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of July, 2018, I caused a copy of the foregoing **DEFENDANTS' FIRST SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FOURTH SET OF INTERROGATORIES** be served email on:

Graydon Dean Luthey, Jr., OBA 5568
GABLE GOTWALS
1100 ONEOK Plaza
100 West Fifth Street
Tulsa, OK 74103-4217
(918) 595-4821
(918) 595-4990 facsimile
dluthey@gablelaw.com
Counsel for Video Gaming Technologies

Gary M. Rubman
Peter Swanson
Michael Sawyer
Rebecca B. Dalton
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, D.C. 20001-4956
(202) 662-6000
(202) 778-5465 facsimile
grubman@cov.com
pswanson@cov.com
msawyer@cov.com
rdalton@cov.com
Counsel for Video Gaming Technologies

Neil K. Roman
COVINGTON & BURLING LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 841-1221
(212) 841-1010 facsimile
nroman@cov.com
Counsel for Video Gaming Technologies

/s/ Robert Gill
Robert C. Gill